

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

WARREN CANNADA,

Plaintiff,

v.

OLD DOMINION BRUSH COMPANY, INC.

Defendant.

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Case No. 3:20-cv-952

PLAINTIFF’S PROPOSED JURY INSTRUCTIONS

Plaintiff, Warren Cannada (“Plaintiff” or “Cannada”), by counsel pursuant to this Court’s Scheduling Order, (ECF No. 8-1), hereby submits the attached proposed jury instructions and verdict form. Plaintiff reserves the right to amend, withdraw and/or propose such other instructions as may become appropriate during the course of the trial. Additionally, in accordance with the Court’s Order, counsel will work with defense counsel to submit an agreed upon set.

Respectfully submitted,

WARREN CANNADA

Plaintiff,

By:

/s/

James B. Thorsen, Esq.

VSB No. 18113

Jesse A. Roche, Esq.

VSB No. 82579

Attorneys for Warren Cannada

THORSENALLEN LLP

5413 Patterson Avenue, Suite 201

P. O. Box 17094

Richmond, Virginia 23226

Telephone: (804) 447-7234

Facsimile: (804) 447-7813

E-mail: jroche@thorsenallen.com

E-mail: jthorsen@thorsenallen.com

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of February, 2022, a copy of the foregoing was filed electronically with the clerk of court using CM/ECF system, which will send notification of such filing (NEF) to the following:

Melissa Y. York, Esquire
VSB No. 77493
Blair H. O'Brien
VSB No. 83961
Counsel for Old Dominion Brush Company, Inc.
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
myork@hccw.com
bobrien@hccw.com

_____/s/_____
James B. Thorsen, Esquire
VSB No. 18113
Jesse A. Roche, Esquire
VSB No. 82579
Attorneys for Warren Cannada
THORSENALLEN LLP
5413 Patterson Avenue, Suite 201
P. O. Box 17094
Richmond, Virginia 23226
Telephone: (804) 447-7234
Facsimile: (804) 447-7813
E-mail: jroche@thorsenallen.com
E-mail: jthorsen@thorsenallen.com